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March 14, 2017

By ECFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Boomerang Wireless, LLC d/b/a enTouch Wireless Eligible
Telecommunications Carrier and Lifeline Broadband Provider
Designation; Oral *Ex Parte* Presentation; WC Dockets 09-197; 11-42**

Dear Ms. Dortch:

On March 10, 2017, John Heitmann of Kelley Drye & Warren LLP had a meeting on behalf of Boomerang Wireless, LLC d/b/a enTouch Wireless (Boomerang) with Amy Bender, Legal Advisor on Wireline to Commissioner O'Rielly regarding Boomerang's petitions for designation as an Eligible Telecommunications Carrier (ETC) in eleven of the federal jurisdiction states¹ and Lifeline Broadband Provider (LBP) designation² that are currently pending before the Commission.

¹ See Amended Petition of Boomerang Wireless, LLC for Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, Maine, New Hampshire, New York, North Carolina, Tennessee, and Virginia, WC Docket No. 09-197 (filed Aug. 25, 2015) (ETC Petition). The petition was originally filed on December 29, 2010.

² See Boomerang Wireless, LLC d/b/a enTouch Wireless Petition for Streamlined Designation as a Lifeline Broadband Provider Eligible Telecommunications Carrier, WC Docket No. 09-197 (filed Oct. 5, 2016) (LBP Petition).

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The matters discussed were consistent with those presented in Boomerang's February 15, 2017 and March 1, 2017 *ex parte* letters.³ Specifically, I requested that the Wireline Competition Bureau (Bureau) reconsider the Revocation Order⁴ to delay the effective date of the revocation of Boomerang's LBP designation until either Boomerang's ETC designation is granted by the state (or the Commission) or 60 days after Boomerang's ETC designation is denied by the state (or the Commission), all of which should be completed within six months. I also emphasized the need for the Bureau to grant Boomerang's ETC Petition expeditiously⁵ and explained which states and service areas in the ETC Petition and LBP petition Boomerang seeks authority to provide Lifeline services (including removal of Federally Recognized Tribal lands from both requests). I further expressed Boomerang's ongoing commitment to comply with all applicable Lifeline program rules and orders.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,



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cc: Amy Bender

³ See Boomerang Wireless, LLC d/b/a enTouch Wireless *Ex Parte* Letter, WC Docket Nos. 09-197, 11-42 (Feb. 15, 2017); and Boomerang Wireless, LLC d/b/a enTouch Wireless *Ex Parte* Letter, WC Docket Nos. 09-197, 11-42 (March 1, 2017).

⁴ See *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 09-197, 11-42, Order on Reconsideration, DA 17-128 (rel. Feb. 3, 2017) (Revocation Order).

⁵ Alternatively, Boomerang requests renewed LBP designation by the Bureau, including a designation that is limited to the eleven federal ETC jurisdictions identified in the ETC Petition.